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August 31, 2003

Federal Communications Commission  
Attn: FCC Commissioner  
445 12<sup>th</sup> St. NW  
Washington, DC 20554

Re: RM-10787 – Elimination of Morse requirements from the Amateur Radio Service.

To The Commission,

I am submitting my comments on petition number RM-10787 submitted by the National Conference of Volunteer Exam Coordinators (NCVEC) on the elimination of Morse code as a requirement for the Amateur Radio Service. I am a licensed Amateur Extra and have been active in Amateur Radio since 1992.

The Morse code requirement is detrimental to the advancement of the art and should be eliminated as authorized by the WRC-03 council decision. I fully support the decision and reasoning of the NCVEC in this request and see the elimination of the Morse requirement as necessary to keep Amateur Radio relevant and progressive into the 21<sup>st</sup> century. In particular:

- 1) Morse code is not utilized by any military, maritime, or other industry outside of Amateur Radio.
- 2) The Morse requirement, despite opponent's arguments otherwise, has never been shown to produce better or more dedicated operators.
- 3) The Morse requirement is deterring new operators from joining the Amateur Radio ranks as the requirement is viewed as old and not relevant for modern day communications. This makes the entire Amateur Radio Service appear to be out of touch with modern realities.
- 4) There are over 1,000 modes of communication allowed for use in the Amateur Service, yet Morse code is the only one that is held to this higher testing standard.
- 5) The Morse requirement has traditional and historical significance, but this is not reason enough to force otherwise competent operators to learn this 150 year old technology.

In addition to the above, if the Commission should see the need keep a practical test in lieu of the Morse requirement, I would propose that aspects of Amateur Radio be tested that focus on broader actual application relevant to a licensed amateur. This procedure could be built around the following practical labs that can be changed for each license grade. For example:

- 1) Demonstration of basic antenna construction skills.
- 2) Demonstration of basic electronic component identification (resistor and capacitor values, diode types, etc.)
- 3) Demonstration of basic soldering skills
- 4) Demonstration of basic skills with a voltmeter.
- 5) Etc.

The above practical tests (or other tests designed around this idea) offer amateurs the chance to practice and display broadly used skills that apply to virtually every aspect of the Amateur Service. This is far more useful and realistic than the existing Morse code requirement utilized today.

In summary, I am in full support of the elimination of the Morse requirement from the Amateur Radio Service and respectfully request that the commission act on this matter quickly. Thank you for allowing me to comment on this important proposal.

Sincerely,

Craig H. Rowland  
K5XOR – Amateur Extra